

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

IN RE ENBRIDGE PIPELINES (ILLINOIS) L.L.C.)	
)	Dkt. No. 07-0446
APPLICATION PURSUANT TO SECTIONS 8-503,)	
8-509, AND 15-401 OF THE PUBLIC UTILITIES)	
ACT/THE COMMON CARRIER BY PIPELINE LAW)	
TO CONSTRUCT AND OPERATE A PETROLEUM)	
PIPELINE AND, WHEN NECESSARY, TO TAKE)	
PRIVATE PROPERTY AS PROVIDED BY THE)	
LAW OF EMINENT DOMAIN)	

**RESPONSES TO PLEASANT MURPHY REQUESTS
FOR DOCUMENTS AND OTHER INFORMATION**

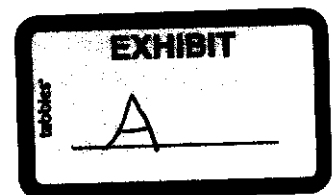
Enbridge Pipelines (Illinois) L.L.C. hereby states its responses as follows:

Document Request No. 1: Please provide a detailed map of every Enbridge pipeline in the U.S. and Canada, including the capacity of each leg of the pipeline and the product transported in each pipeline, and the storage capacity at each tank farm.

Response to Request No. 1: This request is objected to as irrelevant and unduly burdensome. Moreover, information about the Enbridge System is publically available at www.enbridge.com.

Document Request No. 2: Please provide a copy of all applications and submittals to each Canada, U.S., and U.S. state department or agency relating to all existing and proposed Enbridge pipelines, from January 1, 1994 to the present.

Response to Request No. 2: This request is objected to as irrelevant and unduly burdensome.



Document Request No. 3: Please provide all documents submitted by Enbridge to any and all Canadian, U.S., and U.S. state departments or agencies relating to any spill or leak of product from any Enbridge pipeline.

Response To Request No. 3: This request is objected to as irrelevant and unduly burdensome. Information about releases in Illinois has already been provided in Enbridge's testimony and responses to Staff data requests.

Document Request No. 4: Please provide any documents which explain or refer to the temperature of the product in the proposed pipeline from Pontiac, Illinois to Patoka, Illinois.

Response to Request No. 4: Objection -- irrelevant.

Document Request No. 5: Please provide all document describing or relating to the SCADA system for the proposed pipelines, including but not limited to SCADA failures.

Response to Request No. 5: The SCADA system is described in Enbridge's Application and testimony. This request is overly broad and unduly burdensome. There are no "SCADA failures" to document.

Document Request No. 6: Please provide all documents describing or relating to the purchase of the pipe for the proposed pipeline, including but not limited to purchase orders, cost, specification, and delivery items.

Response to Request No. 6: Pipe specifications are given in Enbridge's Application and testimony. The rest of this request is objected to as irrelevant.

Document Request No. 7: Please provide the full version of all thumbnail maps on the route, including the route which was considered in the eastern part of McLean County. The thumbnail maps are the aerial maps which are depicted below.

Response to Request No. 7: This request is objected to as irrelevant and unduly burdensome. Enbridge's proposed route is described in the Application and testimony already filed. The route planning process is described in the responses to Staff data requests, including alternatives.

Document Request No. 8: Please provide all documents describing the content of the material to be transported in the proposed pipeline, including but not limited to its chemical composition.

Response to Request No. 8: Objection -- irrelevant. The pipeline will transport various types of liquid petroleum as presented by various shippers at various times.

Document Request No. 9 Please provide all documents evidencing the organization of petitioner, the officers of the petitioner, and the financial status of the petitioner, including but not limited to its charter and operating agreement.

Response to Request No. 9: See attached documents. Financial information is set forth in the attachments to the Application.

Document Request No. 10: Please provide a detailed map of every pipeline of every Enbridge competitor which competes with Enbridge in the transportation of crude oil in the U.S. and Canada, including the capacity of each pipeline and the storage capacity at each tank farm.

Response to Request No. 10: Objection. This request is irrelevant and unduly burdensome and calls for non-Enbridge information.

Document Request No. 11: Please provide all documents evidencing the public benefit, the necessity and legal and factual basis supporting a certificate in good standing and the necessity for eminent domain for the proposed pipeline.

Response to Request No. 11: See the Application and testimony filed by Enbridge, etc. in support of the Application.

Document Request No. 12: Please depict on a map all pipelines built by Enbridge in the U.S. without the right of eminent domain.

Response to Request No. 12: Objection -- irrelevant.

Document Request No. 13: Please produce all documents which evidence any communication to any person or entity regarding the proposed pipeline, including but not limited to a printed copy of all emails and all requests suggesting or encouraging exparte communication with the ICC.

Response to Request No. 13: Examples of Enbridge communications with landowners and public officials are included in Enbridge's testimony. Hundreds if not thousands of such letters, etc. have been sent out; it would be unduly burdensome to produce them all and thus Enbridge objects to this request. Enbridge does not suggest or encourage ex parte communications with the Commission.

Document Request No. 14: Please provide all agreements between Exxon Mobile and Enbridge made since January 1, 2002.

Response to Request No. 14: Objection -- irrelevant.

Document Request No. 15: Please provide a copy of all insurance policies or proposals relative to the proposed pipeline, including any coverage of property damage, personal injury, and pollution.

Response to Request No. 15: No such documents yet exist.

Document Request No. 16: Please provide all agreements or other documents which create financial liability of any Enbridge entity for the actions or inactions of the petitioner.

Response to Request No. 16: See response to Request No. 9.

Document Request No. 17: Please produce all documents which explain or depict the necessity for a sixty-foot permanent easement for a 36-inch main.

Response to Request No. 17: A sixty-foot wide easement is standard in the industry for a pipe of such size.

Document Request No. 18: Please produce all documents which depict, describe or suggest the construct [sic] of additional pipelines in the proposed corridor.

Response to Request No. 18: No such documents exist.

Document Request No. 19: Please provide all documents which discuss, describe or explain any damages which might be caused or related to the construction and/or use of the proposed pipeline.

Response to Request No. 19: The request fails to define "damages" and thus cannot be responded to meaningfully. Attention is directed to the Agricultural Impact Mitigation Agreement filed with Enbridge's testimony.

Document Request No. 20: Please produce all documents showing the plans and specifications of the proposed pipelines, including but not limited to typical cross sections, pumps, shut off valves, and safety features.

Response to Request No. 20: Objection -- irrelevant. The design and safety requirements of a pipeline such as Enbridge's are matters of exclusive federal jurisdiction.

Document Request No. 21: Please produce all contacts which create a duty, obligation, liability, or responsibility of Enbridge or any anticipate future user of the proposed pipeline.

Response to Request No. 21: This request cannot be answered. The reference to "all contacts" is unintelligible. If the request is meant to be "all contracts," there are no such contracts.

Document Request No. 22: Please produce any documents which discuss, explain, or describe the intentions of Enbridge in the event that it does not receive eminent domain rights for the proposed pipeline.

Response to Request No. 22: Objection -- irrelevant.

OF COUNSEL:

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ENBRIDGE PIPELINES (ILLINOIS) L.L.C.

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Chicago, Illinois 60603
(312) 853-7000

Attorneys for Applicant

Dated: December 13, 2007

By: /s/ Gerald A. Ambrose
One of Its Attorneys

Delaware

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The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "ENBRIDGE PIPELINES (ILLINOIS) L.L.C." IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE THIRTEENTH DAY OF DECEMBER, A.D. 2007.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN PAID TO DATE.

4266545 8300

071319700

You may verify this certificate online
at corp.delaware.gov/authver.shtml



Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 6236260

DATE: 12-13-07

Delaware

PAGE 1

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED ARE TRUE AND CORRECT COPIES OF ALL DOCUMENTS ON FILE OF "ENBRIDGE PIPELINES (ILLINOIS) L.L.C." AS RECEIVED AND FILED IN THIS OFFICE.

THE FOLLOWING DOCUMENTS HAVE BEEN CERTIFIED:

CERTIFICATE OF FORMATION, FILED THE TWELFTH DAY OF DECEMBER, A.D. 2006, AT 6:53 O'CLOCK P.M.

CERTIFICATE OF MERGER, FILED THE FIFTEENTH DAY OF DECEMBER, A.D. 2006, AT 12:11 O'CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE AFORESAID CERTIFICATES ARE THE ONLY CERTIFICATES ON RECORD OF THE AFORESAID LIMITED LIABILITY COMPANY, "ENBRIDGE PIPELINES (ILLINOIS) L.L.C.".



4266545 8100H

071319700

You may verify this certificate online
at corp.delaware.gov/authver.shtml

Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 6236261

DATE: 12-13-07

State of Delaware
Secretary of State
Division of Corporations
Delivered 07:53 PM 12/12/2006
FILED 06:53 PM 12/12/2006
SRV 061137570 - 4266545 FILE

**CERTIFICATE OF FORMATION
OF
ENBRIDGE PIPELINES (ILLINOIS) L.L.C.**

This Certificate of Formation, dated December 12, 2006, has been duly executed and is filed pursuant to Sections 18-201 and 18-204 of the Delaware Limited Liability Company Act (the "Act") to form a limited liability company (the "Company") under the Act.

1. **Name.** The name of the Company is "Enbridge Pipelines (Illinois) L.L.C."
2. **Registered Office; Registered Agent.** The address of the registered office required to be maintained by Section 18-104 of the Act is:

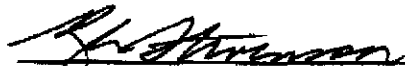
The Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801
County of New Castle

The name and address of the registered agent for service of process required to be maintained by Section 18-104 of the Act are:

The Corporation Trust Company
The Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801
County of New Castle

3. **Effective Time.** The effective time of the formation of the Company contemplated hereby is immediately upon the filing of this Certificate of Formation with the Secretary of State of Delaware.

EXECUTED as of the date first written above.


Name: Bruce A. Stevenson
Title: Authorized Person

State of Delaware
Secretary of State
Division of Corporations
Delivered 12:31 PM 12/15/2006
FILED 12:11 PM 12/15/2006
SRV 061150541 - 4266545 FILE

**CERTIFICATE OF MERGER
OF
CENTRAL ILLINOIS PIPELINE COMPANY LLC
INTO
ENBRIDGE PIPELINES (ILLINOIS) L.L.C.**

Pursuant to Title 6, Section 18-209 of the Delaware Limited Liability Company Act (the "DLLCA"), Enbridge Pipelines (Illinois) L.L.C., a Delaware limited liability company (the "Surviving Entity") hereby submits this Certificate of Merger for the merger of Central Illinois Pipeline Company LLC, an Oklahoma limited liability company (the "Merging Entity") with and into the Surviving Entity (the "Merger") and certifies as follows:

1. The name and jurisdiction of organization of the limited liability company or other business entities (the "Constituent Entities") that are parties to the merger are:

<u>Name of Constituent Entity</u>	<u>State of Organization</u>
Central Illinois Pipeline Company LLC	Oklahoma
Enbridge Pipelines (Illinois) L.L.C.	Delaware

2. A Plan and Agreement of Merger (the "Agreement of Merger") has been approved and executed by the Surviving Entity and the Merging Entity.

3. The name of the surviving limited liability company in the Merger is "Enbridge Pipelines (Illinois) L.L.C.", a Delaware limited liability company.

4. The Agreement of Merger is on file at the principal place of business of the Surviving Entity which is located at 1100 Louisiana Street, Suite 3300, Houston, Texas 77002-5217

5. A copy of the Agreement Merger will be furnished by the Surviving Entity, on request and without cost, to any member of the Constituent Entities.

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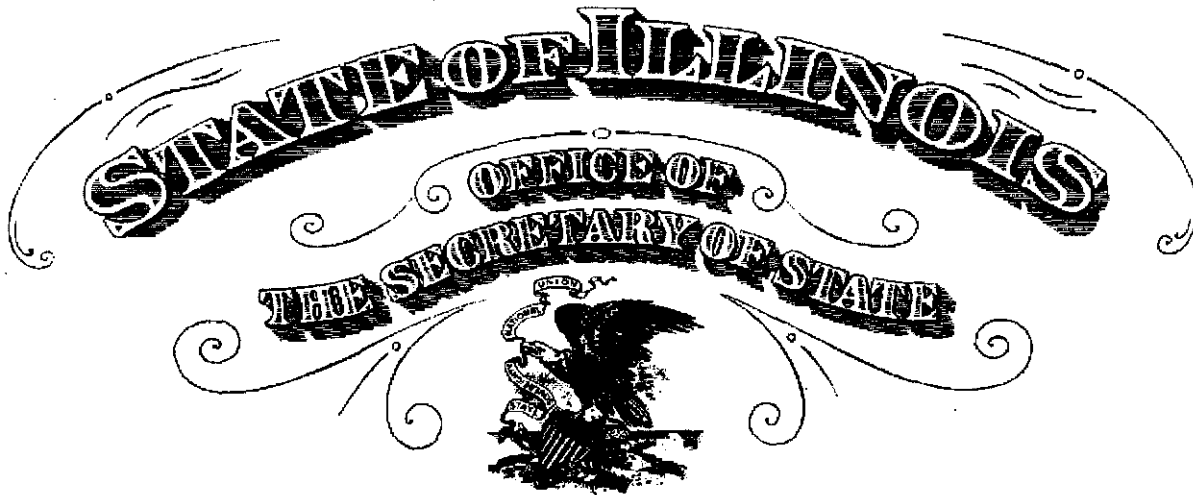
IN WITNESS WHEREOF, this Certificate of Merger has been duly executed as of the 14th day of December, 2006, by an authorized person of the Surviving Entity.

ENERIDGE PIPELINES (ILLINOIS) L.L.C.

By: 
Name: Chris Kalison
Title: Assistant Secretary

File Number

0209002-3



To all to whom these Presents Shall Come, Greeting:

I, Jesse White, Secretary of State of the State of Illinois, do hereby certify that

ENBRIDGE PIPELINES (ILLINOIS) L.L.C., A DELAWARE LIMITED LIABILITY COMPANY HAVING OBTAINED ADMISSION TO TRANSACT BUSINESS IN ILLINOIS ON JANUARY 31, 2007, APPEARS TO HAVE COMPLIED WITH ALL PROVISIONS OF THE LIMITED LIABILITY COMPANY ACT OF THIS STATE, AND AS OF THIS DATE IS IN GOOD STANDING AS A FOREIGN LIMITED LIABILITY COMPANY ADMITTED TO TRANSACT BUSINESS IN THE STATE OF ILLINOIS.



Authentication #: 0734702222

Authenticate at: <http://www.cyberdriveillinois.com>

*In Testimony Whereof, I hereto set
my hand and cause to be affixed the Great Seal of
the State of Illinois, this 13TH
day of DECEMBER A.D. 2007 .*

Jesse White

SECRETARY OF STATE